

FILED

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CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDRE BOWERS,
KAMARI KIDD,
TAE'VONTAE MILES,

Defendants.

) INDICTMENT

)
)
)
)
) CASE NO.

JUDGE BOYKIN
5:17 CR 492
Title 18, United States Code,
Sections 922(g)(1), 922(a)(1)(A),
923(a), 924(a)(1)(D), 924(a)(2)
and 2,
Title 21, United States Code,
Sections 841(a)(1) and (b)(1)(C)

COUNT 1

The Grand Jury charges:

On or about December 22, 2016, in the Northern District of Ohio, Eastern Division, the defendant, ANDRE BOWERS, having been previously convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Failure to Comply with Order or Signal of a Police Officer, in case number 1996CR0759, in the Court of Common Pleas, Stark County, Ohio, on or about September 9, 1996; Aggravated Assault, in case number 2001CR0598, in the Court of Common Pleas, Stark County, Ohio, on or about July 16, 2001; Trafficking in Cocaine, in case number 2003CR1534, in the Court of Common Pleas, Stark County, Ohio, on or about November 15, 2004; Escape, in case number 2006CR270, in the Court of Common Pleas, Stark County, Ohio, on or about April 20, 2006 and Domestic Violence and

Disrupting Public Services, in case number 2014CR1237, in the Court of Common Pleas, Stark County, Ohio, on or about January 30, 2015, did knowingly possess a firearm, specifically, a Harrington & Richardson .32 caliber revolver, model 4, bearing serial #105859, said firearm having previously been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 2

The Grand Jury further charges:

From on or about December 22, 2016 to on or about February 21, 2017, in the Northern District of Ohio, Eastern Division, the defendant, ANDRE BOWERS, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT 3

The Grand Jury further charges:

On or about January 9, 2017, in the Northern District of Ohio, Eastern Division, the defendant, ANDRE BOWERS, having been previously convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Failure to Comply with Order or Signal of a Police Officer, in case number 1996CR0759, in the Court of Common Pleas, Stark County, Ohio, on or about September 9, 1996; Aggravated Assault, in case number 2001CR0598, in the Court of Common Pleas, Stark County, Ohio, on or about July 16, 2001; Trafficking in Cocaine, in case number 2003CR1534, in the Court of Common Pleas, Stark County, Ohio, on or about November 15, 2004; Escape, in case number 2006CR270, in the Court of Common Pleas, Stark County, Ohio, on or about April 20, 2006 and Domestic Violence and

Disrupting Public Services, in case number 2014CR1237, in the Court of Common Pleas, Stark County, Ohio, on or about January 30, 2015, did knowingly possess a firearm, specifically, a Mossberg shotgun, model 500A, 12 gauge, bearing serial #L768791, said firearm having previously been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1) and 924(a)(2).

COUNT 4

The Grand Jury further charges:

On or about January 18, 2017, in the Northern District of Ohio, Eastern Division, the defendant, ANDRE BOWERS, having been previously convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Failure to Comply with Order or Signal of a Police Officer, in case number 1996CR0759, in the Court of Common Pleas, Stark County, Ohio, on or about September 9, 1996; Aggravated Assault, in case number 2001CR0598, in the Court of Common Pleas, Stark County, Ohio, on or about July 16, 2001; Trafficking in Cocaine, in case number 2003CR1534, in the Court of Common Pleas, Stark County, Ohio, on or about November 15, 2004; Escape, in case number 2006CR270, in the Court of Common Pleas, Stark County, Ohio, on or about April 20, 2006 and Domestic Violence and Disrupting Public Services, in case number 2014CR1237, in the Court of Common Pleas, Stark County, Ohio, on or about January 30, 2015, did knowingly possess firearms, specifically, a Mossberg shotgun, model 500AB, 12 gauge, bearing serial #G299118, and a Glock 27, .40 caliber pistol, bearing serial #AARM434, said firearms having previously been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 5

The Grand Jury further charges:

On or about January 24, 2017, in the Northern District of Ohio, Eastern Division, the defendant, ANDRE BOWERS, having been previously convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Failure to Comply with Order or Signal of a Police Officer, in case number 1996CR0759, in the Court of Common Pleas, Stark County, Ohio, on or about September 9, 1996; Aggravated Assault, in case number 2001CR0598, in the Court of Common Pleas, Stark County, Ohio, on or about July 16, 2001; Trafficking in Cocaine, in case number 2003CR1534, in the Court of Common Pleas, Stark County, Ohio, on or about November 15, 2004; Escape, in case number 2006CR270, in the Court of Common Pleas, Stark County, Ohio, on or about April 20, 2006 and Domestic Violence and Disrupting Public Services, in case number 2014CR1237, in the Court of Common Pleas, Stark County, Ohio, on or about January 30, 2015, did knowingly possess a firearm, specifically, a Marlin rifle, model 60, .22 caliber, bearing serial #06110193, said firearm having previously been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 6

The Grand Jury further charges:

On or about January 24, 2017, in the Northern District of Ohio, Eastern Division, the defendant, TAE'VONTAE MILES, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, specifically, Attempted Felonious Assault, in case number 2015CR1751, in the Court of Common Pleas, Stark County, Ohio, on or about February 3, 2016, did knowingly possess a firearm, specifically, a Marlin rifle, model 60, .22 caliber,

bearing serial #06110193, said firearm having previously been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 7

The Grand Jury further charges:

On or about January 24, 2017, in the Northern District of Ohio, Eastern Division, the defendant, ANDRE BOWERS, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of Heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 8

The Grand Jury further charges:

On or about February 10, 2017, in the Northern District of Ohio, Eastern Division, the defendant, ANDRE BOWERS, having been previously convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Failure to Comply with Order or Signal of a Police Officer, in case number 1996CR0759, in the Court of Common Pleas, Stark County, Ohio, on or about September 9, 1996; Aggravated Assault, in case number 2001CR0598, in the Court of Common Pleas, Stark County, Ohio, on or about July 16, 2001; Trafficking in Cocaine, in case number 2003CR1534, in the Court of Common Pleas, Stark County, Ohio, on or about November 15, 2004; Escape, in case number 2006CR270, in the Court of Common Pleas, Stark County, Ohio, on or about April 20, 2006 and Domestic Violence and Disrupting Public Services, in case number 2014CR1237, in the Court of Common Pleas, Stark County, Ohio, on or about January 30, 2015, did knowingly possess firearms, specifically, a Rossi, 20 gauge shotgun, bearing serial #SP766102, a Kel-Tec 5.56 mm pistol, model PLR-16,

bearing serial #P4U42, said firearms having previously been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 9

The Grand Jury further charges:

On or about February 10, 2017, in the Northern District of Ohio, Eastern Division, the defendant, TAE'VONTAE MILES, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, specifically, Attempted Felonious Assault, in case number 2015CR1751, in the Court of Common Pleas, Stark County, Ohio, on or about February 3, 2016, did knowingly possess a firearm, specifically, a Kel-Tec 5.56 mm pistol, model PLR-16, bearing serial #P4U42, said firearm having previously been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 10

The Grand Jury further charges:

On or about February 21, 2017, in the Northern District of Ohio, Eastern Division, the defendant, TAE'VONTAE MILES, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, specifically, Attempted Felonious Assault, in case number 2015CR1751, in the Court of Common Pleas, Stark County, Ohio, on or about February 3, 2016, did knowingly possess firearms, specifically, a Taurus International, .357 caliber revolver, bearing serial #AW79941, and a Military Armament Corporation M10A1 9mm pistol, bearing serial #S8015408, said firearms having previously been shipped and transported in

interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) 924(a)(2).

COUNT 11

The Grand Jury further charges:

On or about February 21, 2017, in the Northern District of Ohio, Eastern Division, the defendants, KAMARI KIDD and TAE'VONTAE MILES, not being licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, aiding and abetting each other and Andre Bowers (charged in Count 2), did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), 924(a)(1)(D) and 2.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.